

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:
Glen H. Green : Case No. 19-20959-GLT
Esther L. Green : Chapter 13
Debtor(s) :
The Money Source Inc. :
 : Related to Document #71
Movant(s) :
 : Hearing: April 7, 2021 @ 1:00 p.m.
vs. :
Glenn H. Green :
Esther L. Green :
Respondent(s) :
and :
United States Trustee, Trustee :
Additional Respondent :

CHAPTER 13 TRUSTEE'S RESPONSE TO
MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Ronda J. Winnecour, through counsel, and files the following Response:

1. The Money Source Inc. requests relief from stay with regard to the real property located at 923 Newell Road, Fayette City, PA 15438 for delinquent post-petition payments.
2. The monthly mortgage payment due Movant post-petition is \$995.26.
3. The Trustee has disbursed payments to Movant in the amount of \$9,748.47.
4. Movant is receiving adequate protection in the form of periodic payments.
5. Debtors' Schedule D lists the value of the property as \$225,000.00, and Movant has not disputed that value.
6. Movant has alleged that the payoff on its mortgage is \$119,500.23, and the Debtors have claimed exemptions against the property totaling \$49,224.00.

7. Therefore, Movant's interests are further protected by an equity cushion in excess of \$60,000.00.

WHEREFORE, the Trustee respectfully requests that this motion be denied, or in the alternative, that the case be converted to Chapter 7.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: March 15, 2021

By: /s/ James C. Warmbrodt
James C. Warmbrodt, PA I.D. 42524
Attorney for Chapter 13 Trustee
US Steel Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
jwarmbrodt@chapter13trusteedpa.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:
Glen H. Green : Case No. 19-20959-GLT
Esther L. Green : Chapter 13
Debtor(s) :
The Money Source Inc. :
 : Related to Document #71
Movant(s) :
 : Hearing: April 7, 2021 @ 1:00 p.m.
vs. :
Glenn H. Green :
Esther L. Green :
Respondent(s) :
and :
United States Trustee, Trustee :
Additional Respondent :

CERTIFICATE OF SERVICE

I hereby certify that on the 15th of March 2021, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Glen and Esther Green
923 Newell Road
Fayette City, PA 15438

Daniel R. White, Esquire
Zebley Mehalov & White PC
POB 2123
Uniontown, PA 15401

Brian Nicholas, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

/s/Rosa M. Richard
Office of Chapter 13 Trustee
US Steel Tower – Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
cmecf@chapter13trusteewdpa.com